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Attorneys for Plaintiffs, TNW Firearms, Inc. and Timothy S. Bero

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

TNW FIREARMS, INC. an Oregon Corporation, and TIMOTHY S. BERO, an individual,

No. 10-cv-01245-AC

Plaintiff,

VS.

TACTICAL MANUFACTURING, INC., a dissolved Oregon Corporation,

Defendant.

## PLAINTIFFS' REQUEST FOR CLERK TO ENTER ORDER OF DEFAULT

Pursuant to Fed. R. Civ. P. 55(a)

#### **CERTIFICATION PURSUANT TO LR 7-1 and 55-1**

Pursuant to LR 7-1, I have made a good faith effort to confer with defendant Tactical Manufacturing, Inc. in this matter via telephone conversations and email. In spite of these efforts and plaintiffs' request that it do so, defendant has failed to file its answer or otherwise respond to the complaint.

## Page 1 - PLAINTIFFS' REQUEST FOR CLERK TO ENTER ORDER OF DEFAULT

SCHWABE, WILLIAMSON & WYATT, P.C. Attorneys at Law Pacwest Center 1211 SW 5th Ave., Suite 1900 Portland, OR: 97204 Telephone 503.222.9981 Fax 503.796.2900

## **REQUEST**

Pursuant to Fed. R. Civ. P. 55(a), plaintiffs request the Clerk to enter an Order of Default against defendant Tactical Manufacturing, Inc., as defendant has not answered the Complaint served upon it on October 13, 2010 [docket number 4].

In support of this Request, plaintiffs rely on the pleadings on file herein and the Declaration of Johnathan E. Mansfield filed in support hereof.

Dated this 15<sup>th</sup> day of November, 2010.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

By:

Johnathan E. Mansfield, OSB #055390 Telephone 503.222.9981 Of Attorneys for Plaintiffs

Trial Attorney: Johnathan E. Mansfield

## **CERTIFICATE OF SERVICE**

I am a resident of the State of Oregon, I am over the age of 18 years, and I am not a party to this lawsuit. My business address is 1211 SW Fifth Avenue, Suite 1900, Portland, Oregon, 97204. On the date listed below, I served the following document titled: PLAINTIFFS' REQUEST FOR CLERK TO ENTER ORDER OF DEFAULT, in the manner indicated:

by placing the document listed above in a sealed envelope to the address set forth below with first class postage thereon fully prepaid and deposited said envelope with the United States Postal Service on the same date set out below.

Tactical Manufacturing, Inc. c/o Scott W. Koller 57319 Hazen Rd. Warren, OR 97053

Defendant

VIA U.S. MAIL

I declare under penalty of perjury under the laws of the State of Oregon that the above is true and correct.

Executed December 15, 2010, at Portland, Oregon.

s/ Johnathan E. Mansfield
Johnathan E. Mansfield